

STEPHANIE M. HINDS (CABN 154284)  
Acting United States Attorney  
SARA WINSLOW (DCBN 457643)  
Chief, Civil Division  
MICHAEL T. PYLE (CABN 172954)  
Assistant United States Attorney  
150 Almaden Boulevard, Suite 900  
San Jose, California 95113  
Telephone: (408) 535-5087  
FAX: (408) 535-5081  
Email: michael.t.pyle@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

<i>REQUEST FOR INTERNATIONAL JUDICIAL</i>	)	MISC. NO.
<i>ASSISTANCE FROM NATIONAL CIVIL</i>	)	
<i>COURT OF FIRST</i>	)	<b>DECLARATION OF AUSA MICHAEL T. PYLE</b>
<i>INSTANCE NO. 9 IN BUENOS AIRES,</i>	)	<b>IN SUPPORT OF APPLICATION FOR ORDER</b>
<i>ARGENTINA IN</i>	)	<b>PURSUANT TO 28 U.S.C. § 1782</b>
<i>HILDA KARINA GRACIELA ZURITA V.</i>	)	
<i>FRED EUGENE BADAGNANI</i>	)	
<i>REF NO.: 1340/20</i>	)	
<i>DJ REFERENCE NUMBER: 189-44-21-24</i>	)	
	)	
	)	

I, Michael T. Pyle, declare:

1. I am an Assistant United States Attorney in the Northern District of California.
2. This declaration is submitted in support of the United States' application for an order pursuant to 28 U.S.C. § 1782 concerning a request made by the First Instance National Civil Court No. 9 in Buenos Aires, Argentina for documents from PayPal Holdings ("PayPal").
3. A true and correct copy of the Letter of Request made by the First Instance National Court No. 9 in Buenos Aires, Argentina in the case of *Hilda Karina Graciela Zurita v. Fred Eugene Badagnani* is attached as Exhibit 1 to my declaration. The Letter of Request seeks information regarding the amount of money in Mr. Fred Eugene Badagnani's account from January 1, 2015 through June 2,

1 2018. The Request provides a specific bank account number, as well as Mr. Badagnani's addresses, date  
2 of birth, and social security number. My office has redacted certain personal information from this  
3 document, and we have redacted financial institutions other than those at issue in the Northern District  
4 of California: PayPal and Patelco Credit Holdings.

5 4. The Department of Justice Civil Division's Office of Foreign Litigation advised me that  
6 banks will not release customer information without a subpoena. I have been an AUSA for  
7 approximately 14 years, and in my experience banks and other financial institutions do not release  
8 customer information without a subpoena. I also searched the websites of PayPal and other financial  
9 institutions, and found statements that the institution requires a subpoena to produce customer  
10 information.

11 5. Attached as Exhibit 2 to my declaration is the form of subpoena I plan to serve on PayPal if  
12 the Court signs the accompanying proposed order. I would need to add the case number and other  
13 information, and then sign the subpoena. I would give PayPal at least 30 days to respond to the  
14 subpoena.

15 6. I declare under penalty of perjury that the foregoing is true to the best of my knowledge and  
16 belief. Executed on July 7, 2021, at San Jose, California.

17  
18 By: */s/ Michael T. Pyle*  
MICHAEL T. PYLE